

1 MELINDA HAAG (CABN 132612)  
United States Attorney

2 J. DOUGLAS WILSON (DCBN 412811)  
3 Chief, Criminal Division

4 ROBERT S. LEACH (CABN 196191)  
Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055  
6 San Francisco, California 94102-3495  
7 Telephone: (415) 436-7200  
8 Fax: (415) 436-7234  
[Robert.Leach@usdoj.gov](mailto:Robert.Leach@usdoj.gov)

9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,	)	Case No. CR 13-0444 RS
	)	
14 Plaintiff,	)	STIPULATION AND <del>[PROPOSED]</del>
	)	PROTECTIVE ORDER
15 v.	)	
	)	
16 ADOREAN BOLEANCU,	)	
	)	
17 Defendant.	)	

18 STIPULATION

19 The United States and the defendant in this action, through undersigned counsel, hereby stipulate  
20 and agree as follows:

21 1. The United States is prepared to produce to defendant's counsel of record in this matter  
22 discovery containing sensitive tax, personal, and/or financial information of third parties, subject to the  
23 following conditions.

24 2. No counsel of record shall disclose any documents or information produced by the  
25 United States to anyone except his or her client, any defense investigators or any defense staff working  
26 on the case, and no defendant, defense investigator, or defense staff shall disclose such documents or  
27 information to anyone, absent further order of the Court.

28 STIPULATION AND ~~[PROPOSED]~~  
PROTECTIVE ORDER, Case No. CR 13-0444 RS

1           3.       The documents and information described above shall be used only to prepare and  
2 evaluate the defense in this proceeding. Any person to whom the documents or information are  
3 disclosed must be provided with a copy of this Stipulation and Order. The materials provided to defense  
4 counsel pursuant to this Stipulation and Order, and any copies thereof, shall be returned to the  
5 government at the conclusion of this case or shall be destroyed, with defense counsel certifying  
6 destruction. In addition, defense counsel shall be permitted to maintain in his electronic client file one  
7 copy of the confidential records for a period of seven years consistent with his obligations as an attorney  
8 licensed in California. This Stipulation and Order shall be appended as the first page of that electronic  
9 file which shall be segregated and noted as a CONFIDENTIAL FILE: SUBJECT TO PROTECTIVE  
10 ORDER.

11           4.       The documents described above shall not be copied unless copying is necessary for  
12 preparation of the defense in this proceeding. Any copy of the materials that is made shall be  
13 accompanied at all times by a copy of this Stipulation and Order

14 DATED: July 29, 2013

15                               Respectfully submitted,

16                               MELINDA HAAG  
17                               United States Attorney

18                               /s/

19                               \_\_\_\_\_  
20                               ROBERT S. LEACH  
21                               Assistant United States Attorney

22                               COLEMAN & BALOGH LLP

23                               /s/

24                               \_\_\_\_\_  
25                               ETHAN A. BALOGH  
26                               Attorney for Defendant Adorean Boleancu

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Dated: 7/30/13

Hon. Richard Seeborg  
United States District Judge